

[Parties and Counsel Listed on Signature Pages]

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY PRODUCTS
LIABILITY LITIGATION

This Document Relates To:

ALL ACTIONS

MDL No. 3047

Case No. 4:22-md-03047-YGR (PHK)

**STIPULATED REQUEST FOR ORDER
CHANGING TIME (DEPOSITION
PROTOCOL)**

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

Pursuant to Civil Local Rules 6-1(b) and 6-2, the Parties, through their undersigned counsel, hereby stipulate and respectfully request that the Court extend the deadline to file a proposed Deposition Protocol or letter briefing on disputes regarding that order to February 27, 2024.

The parties declare in support of this request:

1. Pursuant to Discovery Management Order No. 2 (ECF 606), the Parties are currently negotiating a proposed Deposition Protocol.
2. The current deadline to file a joint proposed Deposition Protocol or letter briefing on disputes regarding that order is February 20, 2024. *See* ECF 606. The Parties have not previously requested an extension to this deadline.

3. The Parties are working diligently to eliminate or narrow disputes over a proposed Deposition Protocol, including by exchanging drafts and through a series of ongoing meet-and-confers.
4. The Parties agree that, given the number of issues they are negotiating with respect to the Deposition Protocol, they would benefit from more time to continue their conferrals and attempt to narrow the disputes they ask the Court to resolve, and seek an extension until February 27, 2024, to afford time for such negotiations.
5. The Parties respectfully request a hearing with the Court, as needed, at the Court's next convenience following the Parties' February 27, 2024, joint submission.
6. In agreeing to this extension, the Parties agree that the Rule 30(b)(6) Notice of Deposition to Defendant Snap with respect to its deletion of certain user accounts will still take place on February 28, 2024, and March 1, 2024, as scheduled. *See* Joint Status Report, at § I.B (ECF 617).

THEREFORE, pursuant to Local Rules 6-1(b) and 6-2, the parties stipulate and respectfully request that the Court extend the deadline to submit a joint proposed Deposition Protocol or letter briefing regarding disputes over that order to February 27, 2024.

IT IS SO STIPULATED AND AGREED.

DATED: February 20, 2024

Respectfully submitted,

By: /s/ Lexi J. Hazam

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PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: _____

PETER H. KANG
United States Magistrate Judge

ATTESTATION

I, Lexi J. Hazam, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: February 20, 2024

By: /s/ Lexi J. Hazam
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